

Joel B. Lautt
UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

IN RE:)
G.M. Bergeron, Inc.) Chapter 11
Debtors) Case No. 09-41541JBR
WEBSTER FIRST FEDERAL)
CREDIT UNION)
Movant)

)

MOTION AND BRIEF OF WEBSTER FIRST FEDERAL CREDIT UNION
FOR RELIEF FROM AUTOMATIC STAY

1. NOW COMES Webster First Federal Credit Union (hereinafter "WFFCU") a secured creditor of the above captioned Debtor, by its attorney, Kevin M. David, and moves this Honorable Court to enter an Order modifying the automatic stay pursuant to Section 362(d) of the United States Bankruptcy Code thereby permitting WFFCU to pursue its state law rights and remedies against the Debtors. As grounds therefore, WFFCU states that the Debtors are unable to afford WFFCU adequate protection, and WFFCU is entitled to relief pursuant to Sections 362(d)(1) and (d)(2) of the Code, with respect to certain real property located at South Main Street, Holden, Massachusetts hereinafter the "Premises"). WFFCU states in support of its Motion as follows: